ENCLOSURE 3 SBA SHIPYARD SUPERFUND SITE JENNINGS, JEFFERSON PARISH, LOUISIANA

INFORMATION REQUEST

QUESTIONS

Section 1

- 1. Do you have or have you ever had a corporate relationship with any of the following entities: ?
 - a. If so, explain your corporate relationship and provide all corporate documentation with respect to your corporate relationship with the entities in question 1 above.
- 2. Were you involved in the day-to-day operations of the entity identified in question 1 between 1965 and 1993?
 - a. If so, describe your role in such day-to-day operations.
- 3. Have you in any way been involved with the Site?
 - a. If so, please describe your involvement with the Site.
- 4. Provide copies of documents related to any involvement identified in question 3(a) above.
- 5. If you have had any involvement with the Site and/or on behalf of the entities in question 1 above, please provide responses to the questions below.

Section 2

- 6. Please identify any dealings or transactions you have or had with SBA Shipyards, Inc., Louis Smailhall, Suzanne Smailhall, LEEVAC Shipyards, Inc., n/k/a Bunge Street Properties, LLC, and LEEVAC Industries, LLC n/k/a LEEVAC Shipyards Jennings, LLC. Please provided a brief description of the nature of those dealings or transactions and the timeframes during which those dealings and transactions occurred.
 - a. Specifically, provide date(s) that your barge(s) were sent and/or removed from the Site, the type of product and/or material your barges brought to the Site, the name and contact information of the person who made such arrangements.
- 7. Please provide any and all documents in your possession that are related to the dealings and transactions detailed in Question 6 above.
- 8. If any of the dealings or transactions described involve hazardous materials, please include a detailed listing of such materials, the materials data safety sheet, dates of transaction, and any quantity associated with those materials.